

In the United States District Court of
The Middle District of Alabama
Eastern Division

2007 DEC 14 A 9:37

Plaintiff, William James Ellis Jr.

v
Defendant, Tina Riley Pelfrey, Dr Warr

Tobetta Holland, Officer Stith

Case # 3:07-CV-920-MHT
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

MOTION TO APPOINT COUNSEL

Comes now the Plaintiff, William James Ellis with good cause seeking Counsel to be appointed to him. To further assist and see these proceedings through.

Discussion

The Plaintiff Comes to this Court and the Honorable Susan Walker to make his pleading. The facts of this Case no longer remain simple. Furthermore contain medical and legal terminology that the Plaintiff, under reasonable circumstances are not familiar with. The Defendants have become increasingly hostile toward the Plaintiff. Even trying to settle the Plaintiff is now left to the Defendants Counsel. Moreover the aforesaid refuse to make Counsel known. Tina Riley Pelfrey has become excessively bitter and cruel to the Plaintiff.

Its reasonable to conclude the Defendants have millions of Dollars at their disposal. The Plaintiff is entirely indigent his complete assets are .43 in his jail account. he receives 1 indigent kit every week, 2 envelopes and 4 pieces of Paper.

One Motion wipes out the ability to properly present and defend his Claims for relief.

Furthermore as of 11/28/07 this Honorable Court Granted an amendment adding 2 more defendants. The Complexity of this Case grows everyday. The plaintiff is Clearly in need of Counsel.

On 11/14/07 the plaintiff received a new MRI upon receiving the results, approx. 5mm of a Disc is pushing out of the plaintiffs spine. The physical aspect of sitting and writing is unbearable.

This does not even apply to the other issues raised by the plaintiff. In 9 months the plaintiff was allowed 1 visit to the law library, with only 30 Minutes of study time.

There is no foreseeable way for the plaintiff to defend his Claim and the elements needed to provide this Court to make the said Claim a timely one.

Submitted this 12th Day of December

Certificate of Service, I William L Ellis have Mailed a exact Copy of this document.

This 12th day of December

William L Ellis Jr

CPO William Ellis
P.O. Box 640
Russell County Jail
Phenix City AL.
36868

MONTGOMERY AL 361

13 DEC 2007 PM 3 L

USA 41

Office of the Clerk
United States Middle District Court
P.O. Box 711 Montgomery Alabama
36101

Legal Mail

36101+0711

Legal Mail